

FILED

SEP 21 2020

U.S. DISTRICT COURT-WVNI
MARTINSBURG, WV 25401

UNITED STATES DISTRICT COURT FOR THE
NORTHERN DISTRICT OF WEST VIRGINIA

UNITED STATES OF AMERICA,

v.

KIA JOHNSON,

Defendant.

Criminal No.

3:20 Cr 37

Violations:

18 U.S.C. § 2
21 U.S.C. § 843(b)
21 U.S.C. § 843(d)

INFORMATION

The United States Attorney charges that:

COUNT ONE

(Aiding and Abetting Unlawful Use of Communication Facility)

On or about September 13, 2019, in Berkeley and Jefferson Counties, in the Northern District of West Virginia, defendant **KIA JOHNSON**, aided and abetted by Shaquan Omar Richardson, a/k/a Wave, did knowingly and intentionally use a communication facility in committing, causing, and facilitating the commission of a felony under Title 21, United States Code, Sections 846, 841(a)(1), and 841(b)(1)(C), that is the defendant used a telephone to conspire to commit a felony drug offense, Conspiracy to Possess with Intent to Distribute and to Distribute a Mixture and Substance Containing Phencyclidine ("PCP"); in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 843(b) and 843(d).



WILLIAM J. POWELL
United States Attorney

Lara Ombs-Botteicher
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